

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

<p>In re:</p> <p>INTEGRATED HEALTH SERVICES, INC., <i>et al.</i>,</p> <p style="text-align: center;">Debtors.</p>		<p>Chapter 11</p> <p>Case No. 00-389 (MFW)</p> <p>(Jointly Administered)</p>
<p>IHS LIQUIDATING LLC,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>ACE INDEMNITY INSURANCE COMPANY f/k/a INDEMNITY INSURANCE COMPANY OF NORTH AMERICA,</p> <p style="text-align: center;">Defendant</p>		<p>Civil Action No. 05-376 (GMS)</p>
<p>IHS LIQUIDATING LLC,</p> <p style="text-align: center;">Third-Party Plaintiff</p> <p style="text-align: center;">v.</p> <p>NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, GENERAL STAR INDEMNITY COMPANY, and ACE INDEMNITY INSURANCE COMPANY f/k/a INDEMNITY INSURANCE COMPANY OF NORTH AMERICA</p> <p style="text-align: center;">Third-Party Defendants</p>		
<p>ACE INDEMNITY INSURANCE COMPANY f/k/a INDEMNITY INSURANCE COMPANY OF NORTH AMERICA</p> <p style="text-align: center;">Third-Party Defendant and Fourth-Party Plaintiff</p> <p style="text-align: center;">v.</p> <p>NATIONAL UNION FIRE INSURANCE</p>		

COMPANY OF PITTSBURGH, PA, and GENERAL STAR INDEMNITY COMPANY,		
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**NOTICE OF ORAL DEPOSITION OF CORPORATE DESIGNEE
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30 (B) (6)**

TO: James F. Harker, Esquire
Cohen, Seglias, Pallas, Greenhall & Furman, PC
Nemours Bldg. - Ste. 1130
1007 Orange Street
Wilmington, DE 19801

PLEASE TAKE NOTICE that, Defendant, ACE Indemnity Insurance Company, pursuant to Federal Rules of Civil Procedure 30(b)(6), will take the deposition upon oral examination of the corporate designee of General Star Management Company at 10:00 a.m. on Monday, April 16, 2007 and continuing daily until completed at location to be determined before a notary or other officer of the Court.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), General Star Management Company must designate one or more of its officers, directors or managing agents or their persons who consent to testify on its behalf and is the person most knowledgeable concerning the subject matters set forth in Section "A" of this Notice.

A. AREAS OF INQUIRY

1. Person most knowledgeable of underwriting, reviewed application for insurance and issuance of binder and policy to Integrated Health Services, Inc. for the period January 1, 1999 to January 1, 2000 and for period January 1, 2000 to January 1, 2002.

2. Person most knowledgeable of underwriting, reviewed application for insurance and issuance of binder and policy to Integrated Health Services of Lester, Inc. for the period January 1, 1999 to January 1, 2000 and for period January 1, 2000 to January 1, 2001.
3. Person most knowledgeable with regard to the underwriting policies and procedures used by General Star Management Company in the review and issuance of Commercial Umbrella policies to Integrated Health Services, Inc. and Integrated Health Services of Lester, Inc. during the period January 1, 1997 to January 1, 2001.
4. Person most knowledgeable with regard to revisions and endorsements added to General Star Management Company policies for the period January 1, 1997 to January 1, 2001.

WETZEL & ASSOCIATES, P.A.

Of Counsel:
Ward A. Rivers, Esquire
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Philadelphia, PA 19103-2978

Date: April 11, 2007

/s/Benjamin C. Wetzel, III
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*Attorney for Ace Indemnity Insurance
Company f/k/a Indemnity Insurance
Company of North America*

CERTIFICATE OF SERVICE

I certify that on April 11, 2007, I electronically filed the within Notice of Deposition with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

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